

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 15 October 2019

Report of:

Head of Planning

Contact Officer:

Andy Higham
Evie Learman
0208 132 0873

Ward:

Edmonton Green

Application Number: 19/00986/FUL

Category: Major

LOCATION: Sinclair's Laundry Site, 199 Brettenham Road, London N18 2HE

PROPOSAL: Demolition of existing buildings and erection of replacement two-storey building for industrial laundry use involving new salt and water tanks, widening of existing vehicular access, new fence to side and rear boundaries and associated works.

Applicant Name & Address:

Sinclair's Laundry
The Imperial London Hotels Limited

Agent Name & Address:

Collective Planning
1 Long Lane
London
SE1 4PG

RECOMMENDATION: That subject to the completion of a S106 Agreement to secure the obligations as set out in the report, the Head of Development Management / the Planning Decisions Manager be authorised to **GRANT** planning permission subject to conditions.

1. Recommendation

1.1 That subject to the completion of a S106 Agreement to secure the obligations as set out in the report, the Head of Development Management / the Planning Decisions Manager be authorised to **GRANT** planning permission subject to conditions:

1. Time Limited Permission

2. Drawing Numbers

Development to be carried out in accordance with approved plans.

3. Materials

Sample panel and a schedule of materials to be used in all external elevations including walls, doors, windows and front entrances within the development.

4. Landscaping

i) Details of trees, shrubs, grass and all other soft landscaped areas of internal and external amenity spaces to be planted on the site;

ii) Where feasible biodiversity enhancement interventions incorporated into the design; and

iii) Any planting which dies, becomes severely damaged or diseased within five years of planting shall be replaced with new planting in accordance with the approved details.

5. Tree Protection - Provident Park

Scheme for the protection of the trees (in the root protection area) in Provident Park, in accordance with BS5837:2012, including a tree protection plan (TPP) and an Arboricultural method statement (AMS)

6. Operational/Service Management Plan

Operational/Service Management Plan including details of:

i) How delivery vehicles will be managed to ensure there is no occurrences of vehicle idling in close proximity to the site;

ii) How vehicle deliveries will be managed to ensure there is no undue noise and disturbance to neighbouring occupiers as a result of the deliveries;

iii) Confirmation that loading doors will be closed shut prior to any vehicle being unloaded in the site; and

iv) Procedure for dealing with noise complaints arising from neighbouring occupiers.

7. BREEAM
Evidence that development achieves a BREEAM New Construction rating of no less than 'Very Good'.
8. Details of access and junction reinstatement/modification
Details of the amended vehicle accesses associated with the development, as follows:
 - i) *Reinstatement of kerbs on two crossovers on Brookside Road;*
 - ii) *Widening of existing kerb/gates on Brookside Road;*
 - iii) *Minor relocation of existing (non-service) dropped kerb on Brettenham Road; and*
 - iv) *Extension of the existing footway crossovers on Brettenham Road and Brookside Road.*
9. Previously Unidentified Contamination
10. Piling, Deep Foundations, and Boreholes
11. Construction Management Plan (CMP)
Construction Management Plan in accordance with London Best Practice Guidance.
12. Cycle Storage
Details of the siting and design of secure covered cycle parking facilities.
13. Subdivision
Building shall not be occupied by more than one business at any one time.
14. Nesting Boxes
Details of bird and/or bat nesting boxes/bricks.
15. Carbon Reduction
The development shall be implemented in accordance with the submitted Energy Statement.
16. Energy Performance
Energy Performance Certificate accompanied by a Built Energy Performance Assessment shall be submitted.
17. Green Procurement and Construction Plan
Green Procurement and Construction Plan detailing how the development has sought to minimise the environmental impact of the scheme.

18. Surfacing Materials

Details and design of the surfacing materials to be used within the development including footpaths, shared surfaces, access roads, parking areas and road markings.

19. Pedestrian Pathways

Details of pedestrian pathways within the curtilage of the site.

20. SUDS – Drainage Strategy

Sustainable Drainage Strategy shall be submitted.

21. SUDS – Verification Report

22. Water Pollution

23. Acoustic Report

Acoustic report to be submitted.

24. External Lighting

2. Executive Summary

2.1 The report seeks approval to a scheme involving the demolition of existing buildings and erection of a replacement two-storey building for industrial laundry use involving new salt and water tanks, widening of existing vehicular access, new fence to side and rear boundaries and associated works. The existing laundry building has been operating on the site for approximately 100-years and the applicants seek to remain at the site but can only do so if expansion and upgrade of existing works occurs.

2.2 The reasons for recommending approval are:

- i) The proposed use would remain as existing which is a well established, acceptable light industrial use;
- ii) The proposed development would be consistent with the objectives of national, regional and local policy in terms of supporting and securing sustainable growth and employment opportunities within the borough;
- iii) The development would improve the quality of the laundry facility's operations in terms of being able to better control noisy operations and vehicular activity (deliveries);
- iv) The upgrade of the site would retain 55 full-time jobs within the borough;
- v) The development would improve the local environment and deliver improved boundary treatment with the adjoining open green space as well as delivering improvements to the open green space secured by legal agreement
- vi) The existing somewhat dilapidated building would be greatly improved and provide a visual upgrade to the immediate street scene and wider surrounding area;
- vii) In comparison to the existing facility the new building would be significantly more sustainable and energy efficient;
- viii) The development would create 7 on-site parking spaces (including a disability space) which would reduce impact upon on-street parking.

24 on-site cycle spaces would also be created which would encourage sustainable methods of transport. As such the development is acceptable in terms of parking, traffic generation and servicing.

- 2.3 The proposed works include demolition of the chimney which would result in the loss of a local landmark however the chimney is not listed and has no other protection mechanisms afforded to it.
- 2.4 The existing site area is 3326 sqm with the existing gross internal area being 2628 sqm. The application proposes an additional 851 sqm of gross internal floorspace taking the total internal floor area to 3479 sqm.

3. Site and Surroundings

- 3.1 The site, measuring 0.3315ha, comprises a group of one and two storey light industrial buildings (Use Class B1c) with the main orientation and access points to the site facing south onto Brettenham Road. The existing buildings are dated and in a poor condition. The laundry has been operating on the site since 1918.
- 3.2 In between Brookside Road to the north and the site is an area of public green space. A terrace of residential properties lie to the west with the rear gardens abutting part of the site. Further residential properties lie to the south and west with No.139 Brettenham Road immediately adjacent to the west of the site.
- 3.3 The main orientation and accesses points to the site face south onto Brettenham Road. A staff car park area is accessed from fenced gates to the north-east of the site.
- 3.4 The site has no designations within the Local Plan however the area of public green space to the rear is designated as Local Open Space.
- 3.5 The immediate surrounding area is largely characterised by residential use with properties in a variety of architectural styles.
- 3.6 The site does not contain any listed building's and does not lie within a Conservation Area. The site falls within Flood Zone 2 and 3.
- 3.7 The existing industrial laundry is under the ownership of The Imperial London Hotels Ltd, who has managed and operated the laundry for the past 100 years to serve their central London hotels. The existing laundry largely employs local people and currently receives around 6 deliveries per day operating a 24/7 system.
- 3.8 There are no existing restrictions on servicing and operational hours and the facility would continue to be a 24/7 operation. The existing use of the site is B1c and this would be retained.

4. Proposal

- 4.1 The proposal is for the demolition of existing buildings and erection of a replacement two-storey building for industrial laundry use involving new salt and water tanks, widening of existing vehicular access, new fence to side and rear and associated works. More specifically the proposal comprises:

- Demolition of existing buildings;
 - Construction of new building which will also extend to the eastern boundary providing a two-storey element;
 - Rationalisation of the roof form and facades to provide more visual coherency;
 - Soft landscaping to periphery;
 - Provision of two (2) new 10m high water tanks located externally to the rear/north and measuring approximately 10m high
 - Erection of new palisade 2.5m high fencing to the rear and sides.
- 4.2 The laundry facility will continue to operate a 24/7 facility with three rolling shifts per day and up to 25 people on site at any given time (with a total maximum number of people employed at the site numbering 55.
- 4.3 The existing use of the site is B1c (light Industrial) and this would be retained.
- 4.4 The current application has been through the formal pre-application process with the Council prior to the current submission.
- 4.5 The pre-application response is summarised as follows:
- The proposal considered acceptable in principle;
 - Some minor modifications to the design are encouraged to ensure some level of visual interest to the street is achieved;
 - Further consideration as to whether the chimney could be retained as it could be viewed as a local landmark;
 - Measures to reduce noise in the form of building fabric and/or 'quiet measures' in the form of equipment is supported;
 - The number of vehicle crossovers should be minimised in order to decrease the potential for highway conflict;
 - The provision of car and cycling parking is supported; and
 - Proposed trees along Brettenham Road may not be achievable given the restricted space on the footpath.

5. Relevant Planning History

- 5.1 PA/02/0032 – Installation of ancillary equipment cabin.
- 5.2 PA/02/0015 – Installation of 15m high telecommunication mast with equipment cabin and ancillary equipment.
- 5.3 TP/98/1002/1 – Details of loading/unloading, fume extraction and sound insulation submitted pursuant to conditions 2, 3, 4 of TP/98/1002 (REFUSED).
- 5.4 TP/98/1002 – Two-storey infill extension to sorting room (GRANTED 23/09/1998)

6. Summary of Key Reasons for Recommendation

- i) The principle of this industrial development is established with the existing use;
- ii) The development would contribute to and retain employment opportunities, largely for local residents;

- iii) The development is acceptable for this location in terms of its appearance, size, siting, scale and design and is an improvement to the existing building;
- iv) The development provides seven formal car parking spaces and 24 cycle parking spaces (the existing site provides neither);
- v) The development does not have an unacceptable impact on neighbouring residential amenity and the upgrade in facilities and provision of a building more fit for purpose will go some way to reducing and containing noise within the building;
- vi) The periphery of the site will be visually improved in terms of a number of dropped kerbs being removed and pavements reinstated. Improvement works to Provident Park at the rear of the site will also take place with new tree planting secured by way of the Section 106 agreement;
- vii) Vehicular movements will be better controlled within and outside of the site with a more cohesive vehicle movement system and enclosed loading bay as well as restricted delivery times; and
- viii) The sustainability credentials of the building will be improved by use of measures such as: high performance building fabrics; water efficiency measures; low airtightness to reduce heat losses through infiltration further; maximising natural light by introducing light panels in the wall cladding; and low energy light fittings with sophisticated controls including daylight and occupancy sensors.

7. Consultation

Public Response:

7.1 Consultation letters were sent to 476 neighbouring properties and a press advert was placed in the local newspaper. Seven responses have been received and these are summarised as follows (officer response follows in para 7.2 and further discussion is within the analysis section of the report):

- 1. Noise generating from the operation of the facility (machinery noise and delivery vehicles);
- 2. Loss of light from the enlargement of the building;
- 3. Loss of parking;
- 4. Increase in pollution arising from any changes to salt-based works; and
- 5. Congestion arising from delivery vehicles waiting to access the site.

7.2 Officer response to neighbour comments as follows:

- 1. The facility will be upgraded in terms of the building envelope. This will result in the building having improved insulation to mitigate noise and an improved and more sophisticated equipment within the facility which will also improve noise reduction. Furthermore, the Environmental Health Officer has raised no objection to the proposal and has advised that a condition is attached to any permission requiring the submission of an acoustic report to confirm the predicted noise reduction.

The use of the laundry will be intensified however the improved construction of the building and upgraded internal facilities will mean

that even with the intensification of the use there will be no additional noise generated over and above the existing.

In terms of deliveries the development proposes an increase from 6 to 12 deliveries per day however the proposed improvement to vehicle access and egress within the site will mean there will be limited if any additional disturbance arising from the extra deliveries over and above existing. Notwithstanding a condition is recommended requiring a management plan to be submitted with details of how delivery vehicles will be managed to ensure there are no waiting delivery vehicles in close proximity to the site. In addition, a further condition is recommended restricting vehicle deliveries/pick-ups to be between the hours of 0600-1800 Monday to Friday and 0800-1600 on Saturdays with no deliveries/pick-ups permitted Sundays and bank holidays.

2. The height of the building will increase from between 7.395m to 10.7m (highest point on the eastern side building) to around 9.56m across the site. As such, whilst the height will increase in parts from the existing building it will decrease in other parts. Notwithstanding, where there is an increase the parts of the building that will increase in height are considered to be insufficient enough to result in any impact on light to neighbouring occupiers.
3. The site will provide seven formal parking spaces compared to the zero as is the current situation. Parking matters are discussed further within the main body of the report.
4. The relevant submitted information has been reviewed by the Council's Environmental Health Officer who has raised no objections subject to conditions.
5. A new delivery system will be implemented which will ensure delivery vehicles are better managed. This is further discussed in the main body of the report.

External Consultees:

- 7.3 *Thames Water*: No objection. Requested condition to be attached requiring technical details of the connection to the existing foul water network infrastructure to accommodate the needs of the development proposal.
- 7.4 *MPS Designing Out Crime*: No objection. Condition requiring the development to confirm attainment of Secured by Design Accreditation, is requested. (Officer comment: there is no explicit policy requirement requiring a Certificate of Compliance to be achieved and therefore a condition will not be attached. However, it should be noted that the majority of the Secure by Design interventions can be implemented on the site).
- 7.5 *London Fire Brigade*: No objection.
- 7.6 *Environment Agency*: No objection.

Internal Consultees:

- 7.7 *Traffic & Transportation:* No objection subject to conditions pertaining to cycle storage required and vehicle crossovers/dropped kerbs.
- 7.8 *Tree Officer:* No objection.
- 7.9 *SuDS Officer:* No objection. Conditions pertaining to SUDS required.
- 7.10 *Environmental Health Officer:* No objection. Conditions pertaining to noise report and Construction Management Plan required.

8. Relevant Policies

8.1 London Plan (2016)

- 2.6 Outer London: vision and strategy
- 2.7 Outer London: economy
- 2.8 Outer London: transport
- 2.16 Strategic outer London development centres
- 3.1 Ensuring equal life chances for all
- 4.1 Developing London's economy
- 4.4 Managing industrial land and premises
- 4.12 Improving opportunities for all
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.5 Decentralise energy networks
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.8 Innovative energy technologies
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road network capacity
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive development
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.14 Improving air quality
- 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes

8.2 The London Plan – Draft

A draft London Plan was published on 29 November 2017 for consultation purposes with a deadline for consultation of 2 March 2018. The draft plan is a material consideration in determining applications but is likely to carry little or no weight until there is a response to consultation submissions or until after its examination. Of particular relevance is Policy GG5 (Growing a good economy); Policy D2 (Delivering good design); and Policy E6 (Locally Significant Industrial Sites)

8.3 Core Strategy

SO1	Enabling and focusing change
SO2	Environmental sustainability
SO6	Maximising economic potential
SO7	Employment and skills
SO8	Transportation and accessibility
SO10	Built environment
CP9	Supporting community cohesion
CP13	Promoting economic prosperity
CP16	Taking part in economic success and improving skills
CP24	The road network
CP25	Pedestrians and cyclists
CP26	Public transport
CP27	Freight
CP30	Maintaining and improving the quality of the built and open environment
CP32	Pollution

8.4 Development Management Document

DMD 20	Locally Significant Industrial Sites
DMD 21	Complementary and supporting uses within SIL and LSIS
DMD 22	Loss of employment outside of designated areas
DMD 23	New employment development
DMD 37	Achieving high quality and design-led development
DMD 38	Design process
DMD 39	The design of business premises
DMD 45	Parking standards and layout
DMD 46	Vehicle crossovers and dropped kerbs
DMD 47	Access, new roads and servicing
DMD 48	Transport assessments
DMD 50	Environmental assessment methods
DMD 51	Energy efficiency standards
DMD 53	Low and zero carbon technology
DMD 55	Use of roof space/ vertical surfaces
DMD 56	Heating and cooling
DMD 57	Responsible sourcing of materials, waste minimisation and green procurement
DMD 58	Water efficiency
DMD 64	Pollution control and assessment
DMD 65	Air quality
DMD 66	Land contamination and instability
DMD 68	Noise
DMD 69	Light pollution

8.5 Other Material Considerations

- National Planning Policy Framework (NPPF) 2018 (revised)
- National Planning Practice Guidelines (NPPG)
- Enfield Characterisation Study
- Manual for Streets
- Mayors Transport Strategy (May 2010)
- Revised Technical Standards for Footway Crossovers (April 2013)
- Refuse and Recycle Storage Guide Enfield (ENV 08/162)
- Travel Planning for new development in London 2011 (TfL)
- Manual for Streets 1 & 2, Inclusive Mobility 2005 (DfT)

9. Assessment

9.1 The main issues arising from this proposal for Members to consider are:

1. Principle;
2. Design;
3. Amenity;
4. Transport;
5. Refuse, Waste and Recycling;
6. SuDS;
7. Sustainability;
8. Biodiversity;
9. Trees;
10. Planning Obligations; and
11. Community Infrastructure Levy.

Principle of Development

- 9.2 The existing industrial facility is in some state of disrepair and does not function in a sustainable or effective manner. The development proposes to improve the functionality of the building including increasing the employment floorspace. The works would also result in significant improvements to the external appearance of the building.
- 9.3 The site is not protected in terms of containing a listed building or being located within a Conservation Area. Given the condition of the existing buildings and the lack of protection afforded to the site the principle of demolition is considered acceptable.
- 9.4 The site primarily employs local people and the applicant has stated there would be no loss of jobs arising from the development. The works will result in an increase of 851sqm of gross internal floorspace and provide an improved working environment for employees.
- 9.5 The external works will provide improved visual amenity to surrounding residential occupiers via the provision of a new and better designed facility. There will also be an upgrade to the boundary to the adjacent area of green space with new fencing and shrub planting.
- 9.6 In terms of land use, London Plan Policy 2.7 seeks to to address constraints and opportunities in the economic growth of outer London so that it can rise

above its long-term economic trends. In addition, London Plan Policy 4.1 seeks to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, and support and promote outer London as an attractive location for national government as well as businesses.

- 9.7 Core Strategy Policy 13 notes that the Council will protect and improve the borough's employment offer and will seek to maintain the competitiveness of employment sectors that are well established and successful in Enfield by providing support and investment to existing companies to facilitate them remaining in the borough. Meanwhile Core Strategy Policy 16 seeks to promote and protect local employment whilst Policy DMD 22 seeks to protect employment by resisting the loss of or reduction of employment within the borough.
- 9.8 The site lies within the Upper Lee Valley Opportunity Area (referred to as the Lee Valley Opportunity Area in the draft London Plan), where it has been identified as a strategic location for industrial, business and employment. As the draft London Plan seeks to continue the role of industrial functions in the area, the proposed continuation of the industrial building will be in line with the adopted and emerging London Plan.
- 9.9 Furthermore the industrial facility will continue to provide and slightly increase employment opportunities to the local area which will contribute to the indicative employment capacity of 15,000 jobs within the Upper Lee Valley Opportunity Area.
- 9.10 The proposal would be wholly consistent with these policies. Furthermore, the comprehensive redevelopment of the site would raise the visual quality of the area and provide an industrial building fit for purpose. The scheme will therefore involve the redevelopment of a prominent industrial site, provide investment in terms of significantly upgrading the building and retain local employment.
- 9.11 It is clear therefore that in principle, the redevelopment of the site is wholly compatible with national, regional and local policy. As such, given the significant improvements that would occur as a result of the development together with there being no loss of employment, the application is supported in principle, subject to further assessment of any design, amenity and/or transport impacts.

Design and Appearance

- 9.12 In terms of design, Core Strategy Policy 30 requires all developments to be high quality and design led, having special regard to their context. Whilst Core Strategy Policy 9 requires proposals to promote attractive, safe, accessible, inclusive and sustainable neighbourhoods as well as connecting and supporting communities and reinforcing local distinctiveness.
- 9.13 Meanwhile Policy DMD 37 seeks to achieve high quality design and requires development to be suitably designed for its intended function that is appropriate to its context and surroundings. The policy also notes that development should capitalise on opportunities to improve an area and sets out urban design objectives relating to character, continuity and enclosure,

quality of the public realm, ease of movement, legibility, adaptability and durability, and diversity.

- 9.14 In terms of business premises making efficient use of land and maximising their contribution to the urban environment, Policy DMD 39 outlines a list of design criteria which proposals for business premises should seek to adhere to, including the requirement to positively address the public realm; clearly differentiate between public and private areas; provide inclusive access arrangements; sensitively screen and locate servicing, parking and refuse (to the rear where possible), mitigate potential negative impacts in surrounding uses; ensure massing and facades are visually interesting; respect the character of the surrounding area; and use high quality materials that can create, enhance or preserve the local character and identity.

Legibility / Character

- 9.15 The existing site has been an operational laundry for 100 years and although it is accepted that the majority of buildings and structures are of limited architectural merit, with the exception of the admin block that is considered to be a good art deco example of its type, the historic value of the site is still considered significant within the local area. In this respect, the existing 25m high chimney provides a landmark signifying the continuing industrial use of the site, with its prominence enhanced by the green space to the north that provides greater views of it than otherwise would be the case if buildings surrounded it on all sides. However, it is accepted that as the building is not a designated or non-designated heritage asset there is no obligation for the applicants to retain this feature which would in any event look incongruent within the scope of the new building.

Height, Bulk and Massing

- 9.16 The proposed buildings will be part single, part two-storey's in height and will overall be slightly higher than the existing building with the current facility measuring between 7.395 to 9.56m high with the apex of the proposed building measuring approximately 9.95m high. The existing building includes a 25m high chimney which will be removed as part of the works. The new building will also rationalise the existing jagged shaped roof by providing a flat roof which would provide a more uniform and consistent appearance. This will result in a building with a more discreet appearance, which is supported given its close proximity to neighbouring residential properties.
- 9.17 The proposed buildings will be part single, part two-storey's in height and will overall be slightly higher than the existing building however this will result in a more cohesive design which will sit better than the existing building within the streetscene. In addition, the flat roof form will align better with the nearby residential buildings which are largely 2-storey.

Appearance

- 9.18 The proposed building will continue to maintain an industrial appearance which will support its function and identity. In terms of materiality, opaque daylight panels (i.e. light will still be able to filter through) are proposed on the front and rear elevations in place of existing brick and painted render walls. This will add to the visual interest in the front and rear elevations whilst ensuring privacy is retained to neighbouring occupiers.

- 9.19 The building will also comprise cladding and bricks which would be in keeping with the nature of the building and the surrounding residential property. As these materials will cover large areas, a condition is recommended requiring further details are submitted to ensure high quality materials are used which would enhance the appearance of the building.

Public Realm Improvements

- 9.20 The site currently has existing wire boundary fencing up to 2.0m high along the north (rear) and eastern side of the site. This fencing to the rear will be replaced with palisade fencing measuring 2.5m high to improve security as well as provide a visual uplift to the existing fencing whilst the fencing to the east will be removed. As the footprint of the proposed building extends to the boundary, the existing wire fence will be replaced by the facades of the new building which will provide visual interest as well as security.
- 9.21 Other public realm improvements include the removal of an existing low-level wall on the Brettenham Road elevation which will enable the pavement to become wider to improve the pedestrian environment. There will also be some improvements to the public open green space to the north of the site. These improvements are to be agreed any may incorporate items such as the provision of bench/es and some planting. They will be provided by a financial contribution £2,500 which will be secured within the Section 106 agreement.

Summary of Design and Appearance

- 9.22 The proposed development is industrial in scale, design and language. Whilst the building lies within a residential area it nonetheless would retain its industrial identity. Given the building will replace an existing industrial facility its replacement would still be considered to be in keeping with the character and appearance of the surrounding townscape. As the rationalised design would result in a more cohesive appearance it would be an improvement in terms of visual amenity and provide an improvement to the streetscene in comparison to the existing situation.
- 9.23 In light of this context, it is considered that the proposed building and works to the immediate surrounding area result in a much improved and better quality building than the existing. Overall the proposal is considered to be a well-designed development that will significantly improve the appearance of the current outdated and in some places, dilapidated, facility. Given the close proximity of the residential properties in the immediate area the improvements to the area of green space to the north of the site are welcomed and where relevant, these will be secured within the legal agreement.
- 9.24 Given the above the proposal is considered acceptable in terms of design and appearance.

Amenity

- 9.25 London Plan Policy 7.6 states that buildings should not cause unacceptable harm to residential amenity, including in terms of privacy and overshadowing. Policies DMD 6 and 8 ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment and the

principles contained in this policy have been applied in this case given the relationship to residential properties. Furthermore, Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity.

- 9.26 The site is located in a predominantly residential area in close proximity to neighbouring occupiers with a distance of around 15.5m between the southern façade of the site and the residential properties lying opposite on Brettenham Road. However, as the laundry has been operating on the site since 1918 it is considered that the facility is well established within the locality.

Operational Hours / Deliveries

- 9.27 There is currently no restriction on the operating hours of the facility, and this will remain the case with the new facility, i.e. the facility will continue to operate on a 24-hour basis 7-days a week.
- 9.28 Whilst there is no restriction on the operational hours of the facility, the upgrade of the laundry will result in an intensification of the use which will subsequently lead to an increase in deliveries. The existing facility has approximately 6 vehicle deliveries in a 24-hour period, mainly during the day, and this will increase to approximately 12 deliveries in a 24-hour period. Whilst the deliveries to the new facility will also be largely during the day, there will be occasions where deliveries will be during the evening and/or night.
- 9.29 The upgrade of the laundry facilities and the subsequent intensification of the use could, as mentioned above, also result in a further increase in deliveries in the future. Given the size and capacity of the laundry it is not expected that any increase in delivery numbers would be substantial however the nature of the business means that the laundry needs to be quick to respond to the laundry needs of the hotels that they service and whilst the majority of laundry deliveries are dealt with during the day, the laundry does need to retain the ability to be able to deliver during the night.
- 9.30 The current facility has a fleet of 3 twelve-tonne lorries, two of which have been upgraded to quieter running gas powered vehicles with the remaining vehicle and any additional future vehicles planned to also be upgraded in the near future. These new vehicles are expected to go some way to facilitating quieter deliveries as will the new delivery access arrangement, which will include a one-way delivery system within the facility with the entrance doors closing after vehicles have entered the facility.
- 9.31 Given the above it is considered there would not be any undue adverse amenity impact arising to neighbouring occupiers in terms of the operational hours and/or deliveries.

Overlooking / Privacy

- 9.32 As mentioned above the new building will include daylight panels on the front elevation facing onto Brettenham Road however these will be opaque to ensure the privacy of neighbouring occupiers is retained whilst still allowing daylight into the building. As such it is considered there would not be any

undue adverse impact arising to neighbouring occupiers in terms of light spillage and /or light pollution.

Light Pollution

- 9.33 As the laundry operates on a 24-hour basis internal blackout shutters are proposed on the eastern and southern elevations in order to mitigate light spillage to neighbouring occupiers.

Noise

- 9.34 The new building will be built to a far higher specification than the existing including new roof and cladding which are more fit for purpose in terms of sound insulation and functionality and as such noise spillage will be reduced by the improved external envelope. In addition, the laundry proposes noise minimising features such as the replacement of the existing metal trolley system with PVC trolleys with low noise wheels.
- 9.35 As mentioned above delivery vehicles will enter and exit differently to the existing system which will reduce vehicle movements along Brettenham Road. In addition, the proposed new vehicle loading bay will be enclosed within the building, further containing noise to internal areas.

Summary

- 9.36 Whilst it is noted that there is some level of concern from neighbouring occupiers in relation to existing noise and disturbance becoming worse, it is clear from the above outlined measures that the opposite will occur. That is, the proposed new measures in terms of vehicle movements and drops-offs, and improved building fabric and internal noise mitigation measures, will result in a quieter facility, despite the intensification of the use.
- 9.37 Notwithstanding the above a condition is recommended requiring further details in the way of an acoustic report to ensure that the sound level generated from the combined plant does not exceed acceptable levels.
- 9.38 In light of the above the proposal is considered acceptable in terms of residential amenity impact subject to conditions as stated.

Highways Impact

- 9.39 DMD 45 relates to car parking, cycle provision and parking design. DMD 47 states that new development proposals will need to demonstrate that enough space for servicing, circulation and access to, from and through the site is provided. All developments must be fully accessible to pedestrians and cyclists and assist with general permeability within an area and the current factory does not provide this. London Plan policy 6.13, DMD policy 45 (Parking Standards and Layout) and 47 (Access, New Roads and Servicing) states that operational parking for maintenance, servicing and deliveries is required to enable a development to function.
- 9.40 The Public Transport Accessibility Level (PTAL) of the site is 2 which is low. Brettenham Road is within a CPZ however restrictions apply to THFC 'event days' only between 12noon and 9pm.

Access / Egress

- 9.41 The site currently contains three dropped kerbs on Brookside Road. Two of these dropped kerbs will be reinstated to a pedestrian pathway and one (at the most northern point of the site) will be widened. There are also two existing dropped kerbs on Brettenham Road, and both of these will be retained (one for servicing purposes only); the other dropped kerb will be moved slightly and widened.
- 9.42 The changes to the dropped kerbs are to facilitate easier access and egress within the site. To this end a route is proposed to run north to south through the site and the building from the consolidated Brookside Road access to the existing eastern Brettenham Road access, which will act as the exit for service vehicles.
- 9.43 The submission documents state that service vehicles will drive through the building, side-unloading dirty laundry, whilst simultaneously side-loading laundry in a single manoeuvre within the boundary of the site. The associated manoeuvres have been demonstrated by a submitted swept path analysis and are considered satisfactory.
- 9.44 The provision of the through route and side-loading capability removes the need for service vehicles to perform reverse manoeuvres into the eastern and western Brettenham Road accesses in order to unload soiled laundry and reload clean laundry respectively. At the eastern Brettenham Road, the access will be widened by approximately 2.3 metres making the exit manoeuvre easier for service vehicles. This is therefore, considered an improvement on the existing situation.
- 9.45 In addition to the above the proposal also includes the removal of a low wall along the site frontage, which will result in an improvement in terms of visibility for service vehicles. This will also increase the width of the pavement along the frontage of Brettenham Road and as such improve the path for pedestrians.
- 9.46 Finally by placing the loading/unloading of laundry within the building and ensuring that doors are closed after vehicles have entered, noise and visual impacts to neighbouring residents will be further minimised, which is also considered an improvement to the existing situation.

Delivery Hours

- 9.47 Paragraphs 10.3 to 10.7 above outline the existing and proposed arrangements in terms of deliveries in relation to potential impact on residential amenity. However, to summarise there is no current restriction on the operational hours of the facility and the operational hours will continue unrestricted after the facility has been upgraded. The unrestricted operational hours are also applicable to deliveries (as is currently the case) and the laundry is expected to have up to 12 deliveries in a 24-hour period (including overnight), 7-days a week.
- 9.48 Although the use of the laundry will be intensified and the number of deliveries increase from 6 to 12 in a 24-hour period, the increase in vehicles is not expected to result in undue transportation issues. This is because the

new facility will incorporate a new one-way delivery system which will stop the need for vehicles reversing out of the facility. Although it is not possible to predict specific delivery times, as these vary according to the changing needs of the operation and the hotels that are serviced, a Service/Operational Management Plan is required to be submitted with details of how delivery vehicles will be managed. This Plan should include confirmation that vehicles will use the 1-way delivery system; that loading bay doors will be shut before vehicles are unloaded; and that no waiting vehicles will be permitted to idle in nearby residential streets whilst they are waiting to enter the laundry.

Car Parking

- 9.49 The parking provision of 7 spaces (1 per 500sqm) is in accordance with the standards set out in The London Plan, which requires the provision of 1 space per 100-600sqm. Currently there is no on-site parking provision however the applicant has stated that of the 52 workers currently employed by the laundry; 45 live locally to the site and commute to work via sustainable means (83%).
- 9.50 The applicants have also confirmed that whilst the remaining members of staff drive to work, and currently park on-street in the surrounding areas, this on-street parking has not given rise to any particular highway safety concerns. The provision of 7 on-site parking spaces therefore represents a significant improvement over the existing situation of zero on-site parking spaces. Furthermore, the development will not result in an increase in the number of employed members of staff and this proposal will not worsen the current situation.
- 9.51 In terms of staff travelling to the site at any given time the laundry will operate over three daily shifts, with a day shift (06:00-14:00), an evening shift (14:00-22:00) and a night shift (22:00-06:00). The applicant has confirmed that there would be a maximum of 25 workers on site at any given time, with the total number of people employed on site numbering 54 (although the submitted planning documents state there would never be this amount of people on site at any one time). As previously mentioned, the application documents state that approximately 83% of the laundry workers use public transport or walk or cycle. As such it is not considered there would be an unacceptable pressure on on-street parking in the surrounding streets, particularly as 7 new on-site car parking spaces will also be provided. These will be located at the rear of the site and accessed via the deliveries entrance on Brookside Road.
- 9.52 The application proposes to retain a dropped kerb for maintenance purposes however it is noted that its removal would add an additional on-street parking space. Notwithstanding, the applicant has stated that the dropped kerb would be used only on a weekly basis for maintenance and servicing of the laundry machinery and would not be used for daily deliveries or collection of laundry which will be carried out at the vehicle drive though at the other end of the building. Whilst it would be preferable to have an additional on-street car parking space in this location it's removal would result in significant operational issues for the laundry in terms of being able to maintain machinery and equipment. As the proposal does not really change the exiting situation and includes other measures towards improving the public realm, such as soft landscaping around the site, it is considered there will be an overall improvement to the existing public realm condition in any event. In light of the above the retention of the dropped kerb is considered acceptable.

Cycle Parking

- 9.53 In terms of cycle parking, the visitor cycle parking is to be located in the main cycle store on the ground floor nearest to the Brettenham Road pedestrian entrance as shown on drawing '14E7.LO.1000.A rev 12'. However, whilst the cycle parking location and quantum is considered acceptable, it is recommended that further details on cycle parking, specifically where visitor and long stay cycle parking will be located within the allocated cycle parking area, is required via condition.

Summary

- 9.54 The above assessment demonstrates that the proposal would not result in an unacceptable impact in terms of traffic and transportation matters, and furthermore is not expected to result in any significant additional impact over and above the existing. As such, subject to conditions requiring a Service/Operational Management Plan to be submitted and a condition providing full details of cycle storage to also be submitted, the proposal is considered acceptable in terms of traffic and transportation.

Refuse, Waste and Recycling

- 9.55 Policy 5.17 of the London Plan requires suitable waste and recycling storage facilities in all new developments whilst Core Policy 22 supports the provision of a sufficient, well-located waste management facility and requires all new developments to provide on-site waste treatment, storage and collection throughout the lifetime of the development.
- 9.56 Meanwhile Policy DMD 57 notes that all new developments should make provision for waste storage, sorting and recycling, and adequate access for waste collection.
- 9.57 With regards to the new laundry facility a waste management facility is proposed to the rear of the site which will cover the requirements of the laundry operation. The application documents confirm that Imperial London Hotels Ltd collect and manage their own waste and do not require collection services from the Council.
- 9.58 Given the above the application is considered acceptable in terms of refuse, waste and recycling.

Sustainable Drainage / Flood Risk

- 9.59 London Plan policies 5.12 and 5.13 require the consideration of the effects of development on flood risk and sustainable drainage respectively. Core Policy 28 ("Managing flood risk through development") confirms the Council's approach to flood risk, inclusive of the requirement for SuDS in all developments. Policy DMD59 ("Avoiding and reducing flood risk") confirms that new development must avoid and reduce the risk of flooding, and not increase the risks elsewhere and that planning permission will only be granted for proposals which have addressed all sources of flood risk and would not be subject to, or result in unacceptable levels of flood risk on site or increase the level of flood risk to third parties.

- 9.60 DMD61 (“Managing surface water”) requires the submission of a drainage strategy that incorporates an appropriate SuDS scheme and appropriate greenfield runoff rates.
- 9.61 The application has been negotiated during the course of the assessment to ensure that it meets necessary Council requirements. Conditions are though recommended requiring a Final SUDS Drainage Strategy and a SUDS Verification Report to ensure approved drainage/ SUDS details have been fully implemented.

Sustainability

- 9.62 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, and policies relevant to sustainability are set out throughout the NPPF. Further planning policies relevant to sustainability are set out in chapter 5 of the London Plan, which states that development proposals should make the fullest contribution to minimising carbon dioxide (CO₂) emissions in accordance with the following energy hierarchy:
- Be Lean: use less energy;
 - Be Clean: supply energy efficiency; and
 - Be Green: use renewable energy.
- 9.63 Enfield’s DMD policy 49 requires the highest sustainable design and construction standards, having regard to technical feasibility and economic viability. These policies require new developments to address the causes and impacts of climate change by minimising energy use, supplying energy efficiently and using energy generated from renewable sources (Core Strategy Policy 20 and DMD51), seeking zero carbon developments (DMD50), using decentralised networks where feasible (DMD52), and providing on-site renewable energy generation to make-up any shortfall where feasible (DMD53).

District Energy Network

- 9.64 The application site lies within approximately 900m of the planned network and as such a future connection to a District Heating scheme may be feasible.
- 9.65 There is expected to be a network nearby in 2022 (provided by ‘Energetik’) however Energetik have confirmed that, subject to the opportunity being reasonable for them, they could provide a temporary boiler if there is a time lag between the development being operational and the provision of the nearby network around 2022.
- 9.66 The application documents state that the energy centre of the building is designed such that once a district heating network becomes available close to the site, the building could connect to the network, subject to viability and financial feasibility. Given the ever increasing importance of sustainable development, in order to ensure the possibility of connecting to a DEN is fully explored a Heads of Term has been included in the legal agreement. This would also align with the developments other sustainability measures such as sourcing washing and drying products that will drive down carbon in excess of 28%. A connection to a DEN could save up to 80% carbon for heat supplied and as such should be fully explored in terms of viability/feasibility.

- 9.67 The development of industrial buildings of this scale is expected to achieve improvements in line with the Building Regulations (Part L). The Energy and Sustainability Statement confirms that the new building will exceed 35% carbon reduction. To ensure the energy performance is in accordance with Building Regulations, a condition is attached.
- 9.68 DMD Policy 50 requires non-residential development to be BREEAM 'Excellent' rating (73.71%). The applicant has submitted an Energy and Sustainability Statement stating the building fabric of the proposal will be compliant with Building Regulations Part L and BREEAM 'Very Good' rating. The submission documents state that due to the way BREEAM ratings are calculated the proposed development could not achieve an 'Excellent' rating despite offering the following strategies (which do not form part of the BREEAM rating system):
- An inherent part of running a laundry is using a significant amount of water continuously for the operation. The new laundry plant and equipment are designed to reuse the wasted water, and use the water more efficiently, therefore reduce the water consumption significantly by at least 50%;
 - The laundry currently has a license to extract borehole water which services the building. The extracted water is already softened and checked frequently for quality. Therefore, this reduces its reliance on using potable mains water;
 - Replacing existing laundry diesel service vehicles with new low CO2 LPG vehicles with increased load capacity to reduce trip numbers; and
 - Non-scheduled small vehicle deliveries will be handled by electric vehicles already in operation by The Imperial London Hotels Ltd.
- 9.69 The applicants state that the above measures combined will have a considerably more positive impact on the environment and sustainability than all other BREEAM issues combined.
- 9.70 Other active energy efficiency features include:
- High performance building fabric of low U-values that exceed Part L minimum standards;
 - Low airtightness to reduce heat losses through infiltration further;
 - Maximising natural light by introducing light panels in the wall cladding;
 - High efficiency building services systems utilising gas-fired condensing boilers for space heating and hot water;
 - Fresh air will be provided via Mechanical Ventilation units with Heat Recovery that preheat incoming air with the wasted heat of the exhaust air; and
 - Low energy light fittings with sophisticated controls including daylight and occupancy sensors.
- 9.71 Whilst low/zero carbon technologies to provide heat or generate energy on site will include:
- A VRF system utilising reverse-cycle Air Source Heat Pumps of high efficiency will provide both space heating and comfort cooling in the

office areas. An ASHP will also be used to provide the base annual hot water load;

- Photovoltaic panels installed on the roof will generate electricity on site.

9.72 Subject to the above measures being incorporated into the development and the viability of becoming connected to a District Energy Network being fully explored as required by the section 106 agreement, the proposal is considered acceptable in terms of sustainability and energy matters.

Biodiversity

9.73 Through Policy 36 of the Core Strategy the Council commits to 'protect, enhance, restore or add to biodiversity interests within the Borough'. This is reaffirmed in the DMD policies 78 to 81.

9.74 The National Planning Policy Framework (NPPF) recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including the establishing of coherent ecological networks that are more resilient to current and future pressures. Paragraph 175 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should therefore be encouraged.

9.75 The application site is situated in a highly urbanised and industrial environment. The site is dominated by the existing laundry facility and parking / servicing areas. As a result, the site has little biodiversity or ecological value at present.

9.76 It is considered there would be a biodiversity enhancement as part of an overall landscaping scheme which is to be conditioned. The proposal allows for landscaping works to the area of green space to the rear/north of the site and potentially to the front elevation on Brettenham Road.

Trees

9.77 Policy DMD 81 states development must provide high quality landscaping that enhances the environment. The development will not include the removal of any trees however the applicant has agreed to pay a financial sum for the provision of tree planting in the public Provident Park at the rear of the site (outside of the red line). The species of trees will be chosen by the Council's arboriculturists and the Council will also undertake the physical planting. As Provident Park currently has a low level of trees in relation to its size additional tree planting would be considered to add positively to the environmental quality of the area. It is noted that Secure by Design comments have previously advised that trees and shrubs are not planted near to the boundary in order to keep the area open and not provide concealment.

Secure by Design

9.78 Following consultation with the Metropolitan Police Service (MPS) Designing out Crime team, the project has the potential to meet some of the criteria for Secured by Design Accreditation. It is noted that part of the criteria involves erecting a highly visible boundary fence a metre higher (to 3.0m in total)

which the Council considered to be unacceptable in visual amenity terms given the residential location of the site. As such the height of the perimeter fence has been lowered to 2.5m and this will be positioned to a small section of the western boundary, the whole of the northern boundary and part of the eastern boundary. Although the MPS recommend a condition that all other recommendations in relation to Secured by Design good practice are implemented this is not considered appropriate as there is no explicit policy requirement requiring a certificate of compliance. As such the proposal is considered acceptable in this regard.

10. Planning Obligations

10.1 The necessary Heads of Terms are:

- Financial contribution of £2,500.00 towards improvement to green space (specifically tree planting) to north of the site;
- Employment and skills strategy in accordance with S106 SPD;
- District Energy Network viability information to be submitted; and
- Monitoring fee

11. CIL

11.1 This would be calculated in accordance with the Mayor's adopted Community Infrastructure Levy Charging Schedule 2012 and Enfield's adopted Community Infrastructure Levy Charging Schedule 2016. The payments would be chargeable on implementation of the commercial development.

11.2 Based on the existing use being an industrial laundry (Use Class B1) and the proposed use remaining the same and an increase in floor area of 851sqm x £60 = £51,060.

12. Conclusion

12.1 The proposed upgrade of the existing laundry building and site is welcomed in principle, and the application has been considered with regard to the National Planning Policy Framework (NPPF) and its presumption in favour of sustainable development.

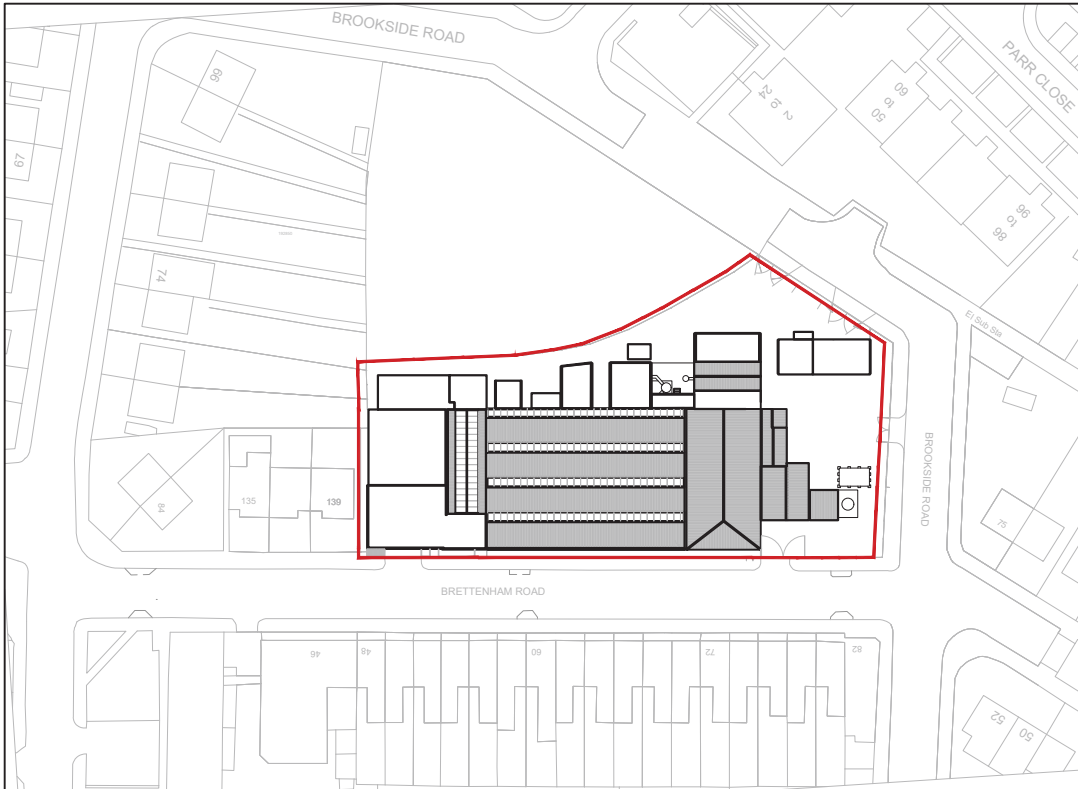
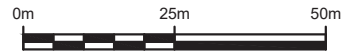
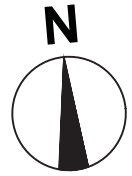
12.2 The upgrade of the site will ensure its' sustainability in terms of being fit for purpose going forward. The site provides ongoing employment largely for local residents which is consistent with a number of Council corporate priorities and the prevailing Development Plan policies in the London Plan and Core Strategy and is a key material planning consideration to be weighed up as part of the assessment of the application.

12.3 The proposal is considered acceptable in terms of land use, which is already established, and is also considered acceptable in terms of design, neighbour amenity impact, transport impact, proposed sustainability and energy reduction measures. This is subject to conditions and to an appropriate Section 106 (s106) agreement, the draft Heads of Terms of which have been agreed with the applicant.

12.4 This report shows that the benefits of the proposed development have been given due consideration and are sufficient enough to outweigh any perceived harm. In this respect the benefits are summarised again as follows:

- The land use is already established with the existing use;
- The development contributes to and retain employment opportunities, largely for local residents;
- The development improves the appearance of the existing building and is considered appropriate in terms of its appearance, size, siting, scale and design;
- The development provides seven formal car parking spaces and 24 cycle parking spaces (the existing site provides neither);
- The development is acceptable in terms of impact on neighbouring occupiers and the new building incorporates noise reduction measures and as such will be a better neighbour than the existing in terms of noise;
- The periphery of the site will be visually improved in terms dropped kerbs being removed and pavements reinstated. Improvement works to Provident Park at the rear of the site will also take place with new tree planting secured by way of the Section 106 agreement;
- Vehicular movements will be better controlled within and outside of the site with a more cohesive vehicle movement system and enclosed loading bay as well as a vehicle management plan; and
- The sustainability credentials of the building will be improved by use of measures such as: high performance building fabrics; water efficiency measures; low airtightness to reduce heat losses through infiltration further; maximising natural light by introducing light panels in the wall cladding; and low energy light fittings with sophisticated controls including daylight and occupancy sensors.

12.5 Having regard also to the mitigation secured by the recommended conditions and Section 106 Agreement, it is considered the proposed development is acceptable when assessed against the suite of relevant planning policies and that planning permission should be granted.



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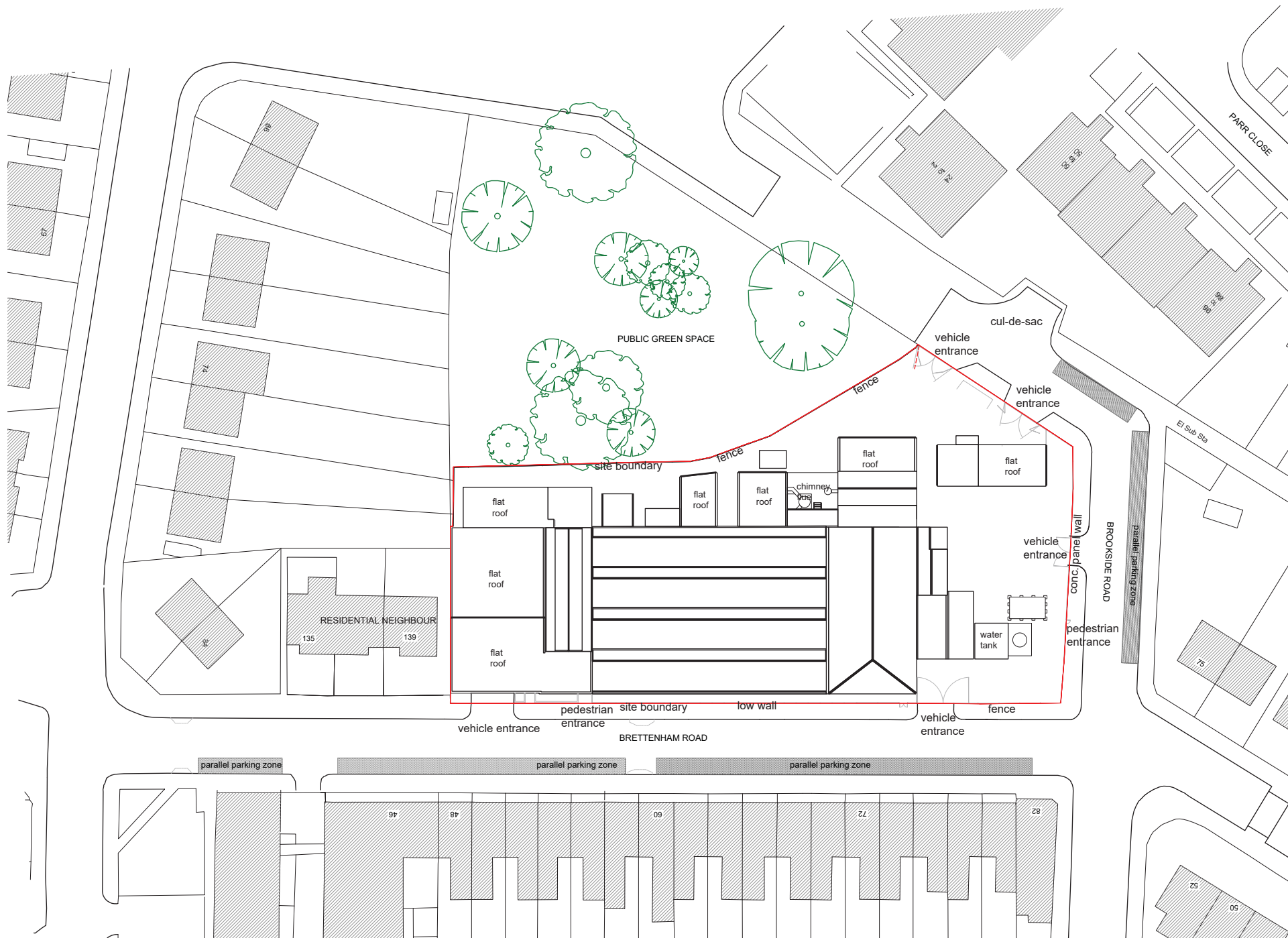
SITE LOCATION PLAN

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Project INPERIAL LONDON HOTELS SINCLAIRS LAUNDRY, EDMONTON NORTH LONDON, N18 2HE	Date 30/03/2015	Drawn by RVW	00 * PLANNING	30.03.2015 RVW
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Date 05.03.2019 Drawn by RVW

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SITE BLOCK PLAN - EXISTING

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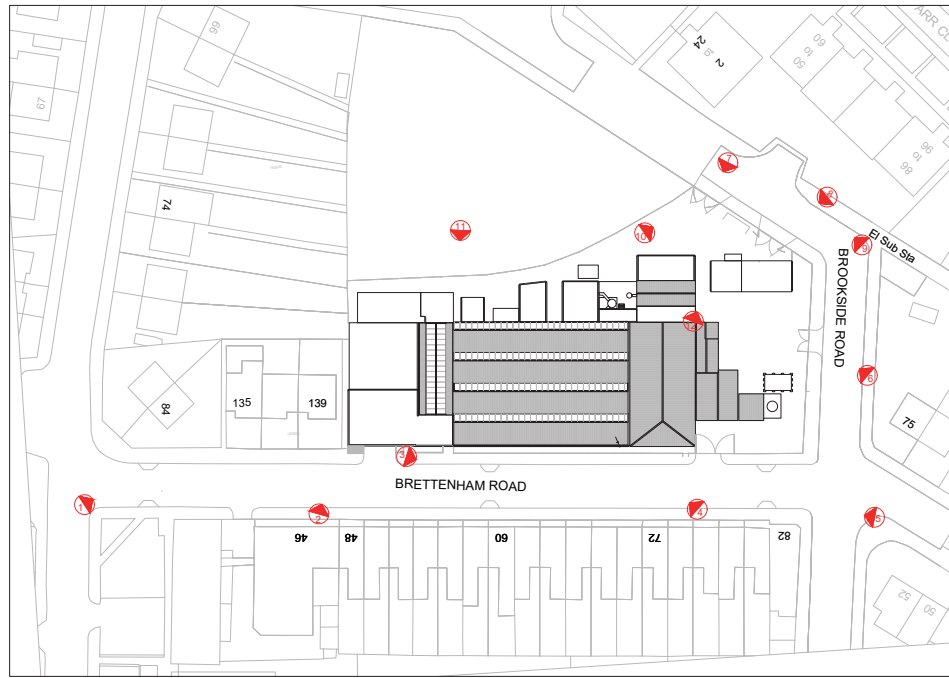
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13 PHOTO LOCATION

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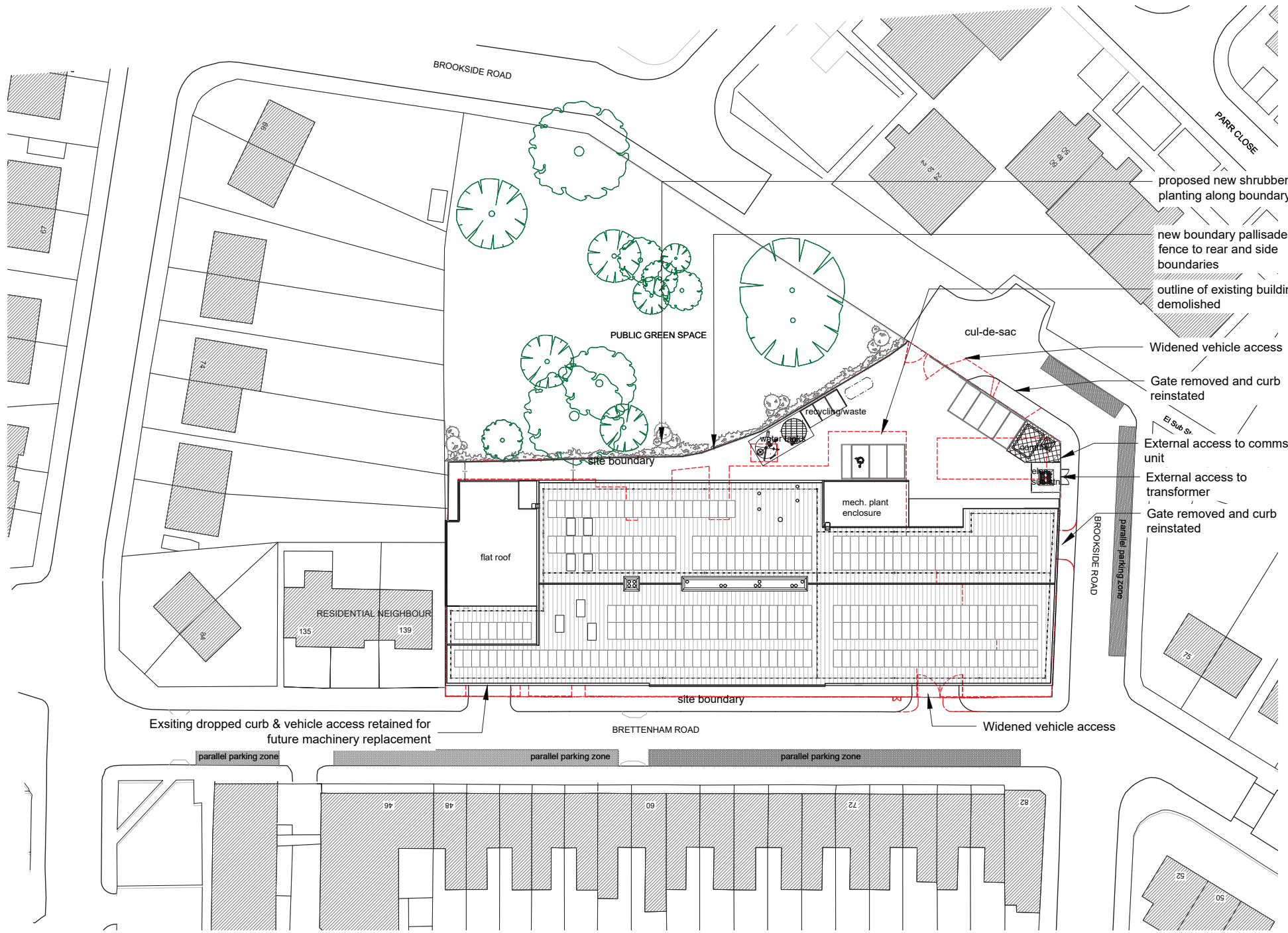
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Drawing Title
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Date Drawn by
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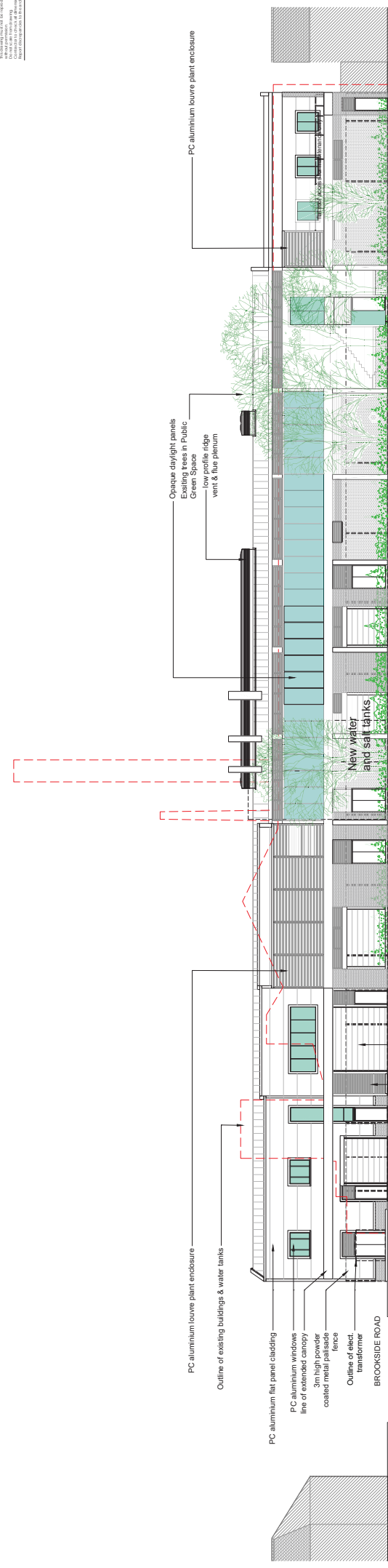
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SITE BLOCK PLAN - PROPOSED

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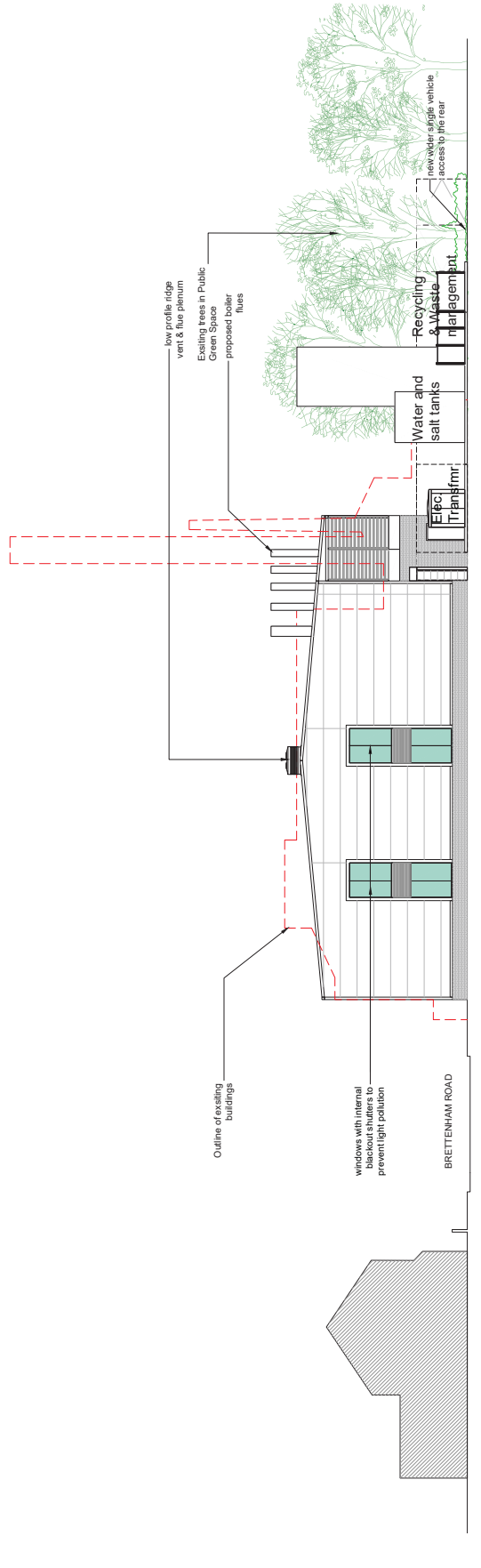
1 NORTH ELEVATION
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IMPERIAL LONDON HOTELS
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 EMINGTON
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 PROPOSED
 NORTH ELEVATION
 WEST ELEVATION

PLANNING	
DATE	14/07/2018
BY	RMV
SCALE	AS SHOWN
PROJECT NO.	14E7 LO 2001 A
DATE	14/07/2018



2 EAST ELEVATION
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BRETtenham STREET - SW VIEW



NW AERIAL VIEW



NE CORNER BROOKSIDE CLOSE AERIAL VIEW

03	04.03.2018	Issued for Planning
02	21.08.2018	Demolish all
01	07.08.2018	Issued for Pre-App planning advice.
00	18.04.2018	Preliminary issue for review

rev	amendments	date	by
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Drawing Status

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Scale A1 @ 1:100 A3 @ 1:200

Drawing No. 14E7.LO.2003.A Rev

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